

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Cr. No. 18-03495 JCH
	)	
<b>DOUGLAS D. SMITH,</b>	)	
	)	
Defendant.	)	

**UNITED STATES' AMENDED EXHIBIT LIST**

The United States respectfully submits the following list of anticipated exhibits which may be used at trial and requests permission to amend such list to include additional exhibits as may become necessary prior to and during trial.

1. Photograph of M.G.'s face showing injuries after cleaning – Bates 781
2. Photograph of missile fragment from right brain – Bates 724
3. Photograph of gunshot entry (close up) – Bates 710
4. Photograph of missile fragment retrieved from M.G. – Bates 726
5. Photograph of white shed, trees, and camper trailer from yard – Bates 2634
6. Photograph of camper trailer from yard – Bates 2635
7. Photograph of yard area and patio area – Bates 2636
8. Photograph of white shed, trees, and camper trailer from porch area – Bates 2637
9. Photograph of trees, camper trailer, and open gate from porch area – Bates 2638
10. Photograph of camper trailer, open gate, and side porch wall from porch area  
Bates 2639
11. Photograph of porch door – Bates 2640

12. Photograph of step of porch door – Bates 2641
13. Photograph of white shed, trees, yard area, and camper trailer – Bates 2642
14. Photograph from camper trailer looking at porch area – Bates 2643
15. Photograph of trees between yard and Motel rooms with red car – Bates 2644
16. Photograph of motel and metal shed – Bates 2645
17. Photograph of camper trailer corner and metal shed – Bates 2646
18. Photograph of porch door and trees from the front gate area – Bates 2647
19. Photograph of trees between yard, fence, and camper trailer – Bates 2648
20. Photograph of Motel with private property sign – Bates 979
21. Photograph of Motel with sign and fence – Bates 980
22. Photograph of door of room #6 at Motel – Bates 1029
23. Photograph of side gate with sign – Bates 1030
24. Photograph of Motel with address number – Bates 1037
25. Photograph of bullet hole in trailer marked H1 – Bates 1331
26. Photograph of bullet hole in trailer marked H1 (close up) – Bates 1333
27. Photograph of metal shed with bullet hole – Bates 1163
28. Photograph of bullet hole marked H2 – Bates 1165
29. Photograph of bullet impact in metal shed marked I1 – Bates 1179
30. Photograph of bullet hole in television marked I1 (close up) – Bates 1184
31. Photograph of Defendant's yard facing Motel rooms – Bates 1376
32. Photograph of Defendant's yard with wooden shed – Bates 1413
33. Defendant's Miranda Waiver for May 5, 2018 statement to EPD Detective Byron Abeyta – Bates 33

- 34. Redacted recording of Defendant's May 5, 2018 statement to EPD Detective Byron Abeyta
- 35. Redacted Transcript of recording of Defendant's May 5, 2018 statement to EPD Detective Byron Abeyta
- 36. Diagram Defendant drew in May 5, 2018 interview with Detective Abeyta – Bates 730
- 37. Photograph of Motel from street with M.G. – Bates 78
- 38. Photograph of M.G. with light and trailer – Bates 84
- 39. Photograph of trailer side view – Bates 89
- 40. Photograph of front gate – Bates 92
- 41. Photograph of Defendant's front yard – Bates 95
- 42. Photograph of Defendant's front door area – Bates 96
- 43. Photograph of gun marked #1 – Bates 100
- 44. Photograph of two spent bullets marked #2 and #3 (close up) – Bates 102
- 45. Photograph of spent bullet marked #4 – Bates 116
- 46. Photograph of spent bullet marked #5 – Bates 117
- 47. Photograph of M.G. – Bates 105
- 48. Photograph showing blood loss – Bates 111
- 49. Photograph showing injury – Bates 112
- 50. Photograph showing injury to face – Bates 114
- 51. Photograph showing injury to forehead – Bates 115
- 52. Photograph of trailer and blood stain – Bates 136
- 53. Photograph of trailer and front yard – Bates 137

54. Photograph of bullet hole in trailer (close up) – Bates 124
55. Photograph of bullet hole – Bates 125
56. Photograph of metal shed behind trailer in background – Bates 127
57. Photograph of bullet hole in metal shed (close up) – Bates 130
58. Photograph of M.G. at the scene – Bates 624
59. Photograph of M.G. and foliage – Bates 634
60. Photograph of M.G. and blood stain – Bates 643
61. Photograph of Motel rooms front view – Bates 657
62. Defendant's *Miranda* Waiver for May 7, 2018 statement to FBI agents – Bates 2
63. Diagram Defendant drew in May 7, 2018 interview with FBI agents – Bates 7
64. Pueblo of Santa Clara enrollment letter for M.G. – Bates 2679
65. Pueblo of Taos non-enrollment certificate for Defendant – Bates 2675
66. Aerial photograph of highway, KFC, and Western Winds Motel – Bates 2649
67. Aerial photograph of KFC and Western Winds Motel – Bates 2650
68. Aerial photograph of Western Winds Motel – Bates 2651
69. Aerial photograph of Western Winds Motel with cars in the yard– Bates 2652
70. Aerial photograph of Western Winds Motel between the office and rooms – Bates  
2653
71. Aerial photograph of Western Winds Motel, highway on the right and KFC –  
Bates 2654
72. Aerial photograph of Western Winds Motel all rooms, office and parking lots–  
Bates 2655

73. Aerial photograph showing close up of yard, camper trailer, and driveway– Bates  
2656
74. Aerial photograph Western Winds Motel with parking lot – Bates 2657
75. Trajectory diagram – Bates 1469

Respectfully submitted,

FRED J FEDERICI  
Acting United States Attorney

Electronically filed on 06/07/21  
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I HEREBY CERTIFY that I electronically filed  
the foregoing with the Clerk of the Court using  
the CM/ECF system which will cause a copy of  
this filing to be sent to counsel for Defendant.

/s/  
NOVALINE D. WILSON  
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